

Exhibit 8
Filed Under Seal

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GOOGLE LLC,)
)
PLAINTIFF,)
)
VS.) NO.
) 3:20-cv-06754-
SONOS, INC.,) WHA
)
DEFENDANT.)
_____)
SONOS, INC.,)
)
PLAINTIFF,)
) 3:21-CV-07559-
VS.) WHA
)
GOOGLE, LLC,)
)
DEFENDANT.)
_____)
_____)

ZOOM VIDEOTAPED DEPOSITION OF

ADAM GRAHAM, VOLUME 2

WEDNESDAY, MAY 18, 2022

PAGES 141 - 251

JOB NO. 5240890

REPORTED BY: D'ANNE MOUNGEY, CSR 7872

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<p>1 speak with anyone about the substance of your 2 testimony? 3 A I did not. 4 Q I want to stay on this exhibit for just a 5 little while longer. 12:02:11 6 I believe earlier in your deposition you 7 testified that Sonos had a collaboration with QQ? 8 A That is correct. 9 Q Is it your testimony that the QQ Music 10 could solve the beer test? 12:02:45 11 A I don't believe that was my testimony. I 12 believe -- I don't recall -- I don't recall fully, 13 but I don't believe it did. 14 Q Okay. Just to make your testimony clear, 15 it's not your opinion that QQ solved the beer test; 12:03:01 16 is that correct? 17 A It's not my recollection, correct. I can't 18 100 percent confirm that. 19 Q Do you recall who within Sonos worked on 20 the QQ integration? 12:03:19 21 A Yeah. I believe in the prior testimony, we 22 had mentioned Kristen Bender was a part of that 23 work. 24 Q Do you recall anybody else? 25 A I believe Tad Coburn. 12:03:38 Page 230</p>	<p>1 A That is correct. 2 Q And I just want to get an understanding of 3 kind of what's on this page. 4 So starting from left to right, it -- the 5 document seems to progress from QQ Music to Google 12:05:47 6 P2 to other projects. 7 Is that a fair characterization? 8 A That looks to be a fair characterization, 9 correct. 10 Q And under the category -- or project, 12:06:06 11 rather, for example, under QQ Music, there are a 12 number of bullet points and these bullet points are 13 features that are associated with that particular 14 integration; is that correct? 15 A That looks to be my understanding. 12:06:31 16 One clarification, I don't know if they're 17 all features. It might be just kind of more 18 descriptions in some cases of the implementation. 19 Q Okay. And one of the descriptions of the 20 QQ Music implementation would be that it utilized a 12:06:50 21 private Local Queue; is that correct? 22 A That's what it states here, correct. 23 Q And what it does not state is that one of 24 the features is a private Cloud Queue; is that 25 correct? 12:07:12 Page 232</p>
<p>1 Q Anyone else? 2 A I believe Andy Schultert was involved. 3 Q Anyone else? 4 A And then the Sonos team members from the 5 Sonos China team, but I don't remember exactly who. 12:03:56 6 Q Okay. Do you know when the collaboration 7 began, or integration began? 8 A I actually don't know when it began. 9 Q Do you know roughly when it concluded? 10 A I don't recall, but my guess is -- I think 12:04:18 11 I started in 2012, so guessing here, I want to say 12 it was like early 2013. I don't recall. Maybe 13 February, March. I don't know. Again, this is just 14 pure guess. 15 Q And was this integration implemented for 12:04:42 16 the United States or in China? 17 A My recollection is that it was just for 18 China. 19 Q If you could turn back to the first page of 20 this exhibit, which for the record is 1037, and at 12:05:15 21 the top it says "P2S Tech Roadmap." 22 Do you see that? 23 A I do. 24 Q The P2S refers to Play to Sonos; is that 25 correct? 12:05:35 Page 231</p>	<p>1 A That is not written here, that is correct. 2 Q And do you have an understanding as to 3 whether or not QQ Music used that private Cloud 4 Queue? 5 MR. LEE: Objection to form. 12:07:24 6 THE WITNESS: Based on this document and my 7 recollection, I don't believe it did, but I wasn't 8 the technical -- I didn't implement this. 9 BY MR. WILLIAMS: 10 Q And one of the progressions from -- or the 12:07:37 11 next progression from QQ Music was the Google V2 12 integration; is that correct? 13 A That's what's on this document, correct. 14 Q Just for the record, you don't have a 15 reason to disagree with what's on this document; 12:07:56 16 correct? 17 A I don't have a reason to disagree, correct. 18 Q Okay. And one of the features of the 19 Google V2 integration would be the -- utilized a 20 private Cloud Queue; is that correct? 12:08:16 21 A That's what this document states. 22 Q And you're not aware of any other Play to 23 Sonos integration that implemented a private Cloud 24 Queue prior to Google V2; correct? 25 MR. LEE: Objection to form. 12:08:51 Page 233</p>

<p>1 THE WITNESS: I don't recall.</p> <p>2 BY MR. WILLIAMS:</p> <p>3 Q Just so we're clear, as you sit here today,</p> <p>4 you don't have any knowledge as to if one existed at</p> <p>5 the time; correct? 12:09:19</p> <p>6 A I don't have any recollection, that's</p> <p>7 correct.</p> <p>8 Q Do you have any knowledge as to any</p> <p>9 differences between a private Local Queue and a</p> <p>10 private Cloud Queue as used here on page 1 between 12:09:43</p> <p>11 QQ Music and Google V2?</p> <p>12 MR. LEE: Objection to form.</p> <p>13 THE WITNESS: It would be -- I don't have a</p> <p>14 full recollection. It would be my best recreation</p> <p>15 of what I think from today, so I can't answer that 12:10:04</p> <p>16 independently so I don't recall.</p> <p>17 BY MR. WILLIAMS:</p> <p>18 Q You can give me your best recollection as</p> <p>19 you remember today.</p> <p>20 A You know, QQ was the first run. It talks 12:10:17</p> <p>21 about using UPnP to communicate, so that suggests to</p> <p>22 me -- again, I forget all the details of this.</p> <p>23 But I believe -- if I'm recalling</p> <p>24 correctly, QQ didn't solve the beer test and that</p> <p>25 was the hope in Google V2, was to solve the beer 12:10:36</p> <p style="text-align: right;">Page 234</p>	<p>1 partners, but, again, that's recollection from</p> <p>2 today.</p> <p>3 Q So that's pure speculation; is that fair?</p> <p>4 A To the best -- yeah, the best I got today.</p> <p>5 Q And you don't -- or excuse me. 12:12:26</p> <p>6 Do you have any knowledge as to whether or</p> <p>7 not Google was independently working on solving the</p> <p>8 beer test?</p> <p>9 MR. LEE: Objection to form.</p> <p>10 THE WITNESS: The problem I have with that 12:12:45</p> <p>11 question is I don't believe the beer test was a</p> <p>12 Google term. That to me is a Sonos specific thing,</p> <p>13 so I have no knowledge whether or not -- what they</p> <p>14 were doing.</p> <p>15 BY MR. WILLIAMS: 12:12:57</p> <p>16 Q Right.</p> <p>17 It might not be the exact -- those exact</p> <p>18 words, but the substance of the beer test, were you</p> <p>19 aware of whether or not Google was independently</p> <p>20 working on the same feature? 12:13:12</p> <p>21 A I have no knowledge.</p> <p>22 Q I think you just testified that under QQ,</p> <p>23 the UPnP suggests to you that the beer test was not</p> <p>24 met.</p> <p>25 And why was that? 12:13:47</p> <p style="text-align: right;">Page 236</p>
<p>1 test.</p> <p>2 Q When you say with the help of Google V2 to</p> <p>3 solve the beer test, what do you mean by that?</p> <p>4 A I believe with QQ, that it didn't pass the</p> <p>5 beer test. So if the controller left, the music 12:11:10</p> <p>6 would eventually stop.</p> <p>7 I believe the goal with Google -- and I</p> <p>8 can't recall if this was met or not -- was to</p> <p>9 actually solve that problem.</p> <p>10 Q Do you know whether it was Sonos's or 12:11:24</p> <p>11 Google's idea to implement -- to have V2 solve the</p> <p>12 beer test?</p> <p>13 MR. LEE: Objection to form.</p> <p>14 THE WITNESS: That would be speculation on</p> <p>15 my part. I don't recall. 12:11:42</p> <p>16 BY MR. WILLIAMS:</p> <p>17 Q To the best of your recollection, do you</p> <p>18 know whose initiative that was?</p> <p>19 A I always attribute it to Sonos. I've heard</p> <p>20 since -- I recall since I started there, that the 12:11:53</p> <p>21 beer test was always important to us, and my</p> <p>22 recollection was that it was always more important</p> <p>23 to us than to our partners.</p> <p>24 It's something that we always kind of</p> <p>25 believed in and it always felt more so than our 12:12:05</p> <p style="text-align: right;">Page 235</p>	<p>1 What is the basis for that testimony?</p> <p>2 A So this is just from my basic</p> <p>3 understanding. UPnP is a local protocol, so you</p> <p>4 would need to be on network for that to work and</p> <p>5 then, therefore, breaking the beer test. 12:14:06</p> <p>6 Q You testified a lot today and on Friday</p> <p>7 regarding the Sonos Music API.</p> <p>8 How, if at all, did the Sonos Music API fit</p> <p>9 into the QQ Music integration?</p> <p>10 MR. LEE: Objection to form. 12:14:52</p> <p>11 THE WITNESS: Yeah. I don't know.</p> <p>12 The one thing that I can state, I</p> <p>13 believe -- and this is the best of my</p> <p>14 recollection -- I believe there is a SMAPI QQ</p> <p>15 implementation. So QQ Music implemented a service 12:15:14</p> <p>16 on Sonos via SMAPI.</p> <p>17 BY MR. WILLIAMS:</p> <p>18 Q Okay. And the QQ implementation on</p> <p>19 Sonos -- sorry.</p> <p>20 The QQ implementation of the -- sorry. 12:15:49</p> <p>21 QQ Music implementation on Sonos via SMAPI,</p> <p>22 did that satisfy the beer test?</p> <p>23 MR. LEE: Objection to form.</p> <p>24 THE WITNESS: This would be just my opinion</p> <p>25 again; is that okay? 12:16:11</p> <p style="text-align: right;">Page 237</p>